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November 3, 2021

VIA ECF

United States District Court
Eastern District of New York
225 Cadman Plaza E
Brooklyn, New York 11201

Attention: Hon. Magistrate Judge Peggy Kuo, U.S.M.J.

Re: *Connelly et. al. v. Government Employees Insurance
Company et.al.* 1:21-cv-06091-EK-PK
Related Acton: *In Re GEICO Consumer Data Breach
Litigation*, 1:21-cv-2210-KAM-RLM

Dear Hon. Judge Kuo:

We are counsel for the GEICO defendants ("GEICO") in the above-mentioned matter, *Connelly et. al. v. Government Employees Insurance Company et.al.* 1:21-cv-06091-EK-PK ("*Connelly*") and in *In Re GEICO Consumer Data Breach Litigation*, 1:22-cv-2210-KAM-RLM. *Connelly* was recently transferred from the District Court of Maryland and assigned to this Part. *See Connelly*, ECF Docket No. 26. We request that *Connelly* be reassigned and transferred to Hon. Judge Kiyo Matsumoto, who is currently presiding in *In Re GEICO Consumer Data Breach Litigation*.

Connelly was transferred to the Eastern District of New York, pursuant to 28 U.S.C. 1404(a), because it asserts the same or substantially similar putative class action claims concerning the same alleged data breach by GEICO as those asserted in the individual Eastern District of New York cases that have since been consolidated as *In Re GEICO Consumer Data Breach Litigation*. Accordingly, it is requested that *Connelly* likewise be transferred to Judge Matsumoto as a related matter and likely be consolidated.

We are available to answer any questions at the Court's convenience.

Very truly yours,

Rivkin Radler LLP

Shari Claire Lewis

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cc: All Counsel (via ECF)

Hon. Judge Matsumoto, U.S.D.J.
(via ECF in *In Re GEICO Consumer Data Breach Litigation*)